

# TEXAS BORDER SHERIFF'S COALITION

Received & Inspected

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FCC Mail Room



June 28, 2012

The Honorable Julius Genachowski, Chairman  
The Honorable Robert McDowell  
The Honorable Mignon Clyburn  
The Honorable Ajit Pai  
The Honorable Jessica Rosenworcel

Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

Re: Petition for Waiver of Dell Telephone Cooperative, Inc.; *Connect America Fund*, WC  
Docket No. 10-90

Dear Mr. Chairman and Commissioners:

The Texas Border Sheriff's Coalition is concerned that the FCC's recent Universal Service Order could threaten our nation's security by disrupting the critical communications services upon which our Coalition members rely to protect the U.S.-Mexico border.<sup>1</sup> We are particularly concerned about the impact of the new rules on Dell Telephone Cooperative, Inc. ("Dell Telephone"), and we are submitting this letter in strong support of Dell Telephone's petition for waiver.

Dell Telephone provides voice and broadband services in Hudspeth, Culberson, and Jeff Davis counties, which include a 59-mile stretch of the Texas-Mexico border. We understand that to provide these services, Dell Telephone relies on universal service support administered by the FCC. We also understand that the FCC's recent Universal Service Order dramatically reduces the support Dell Telephone will receive, which threatens to drive the company out of business.

A principle responsibility of the Coalition is to secure the Texas-Mexico border. Without the communications services provided by Dell Telephone, we could not do our job. We rely on Dell Telephone's network for voice and broadband services and dedicated special access circuits, which are necessary for critical border security and public safety operations.

<sup>1</sup> The Texas Border Sheriff's Coalition was organized on May 4, 2005 and is represented by the Chief Law Enforcement Officer of each respective county. The Coalition consists of 20 member counties, all of which are located within 25 miles of the Texas-Mexico border. Our Coalition works hand-in-hand with local sheriffs, city police departments, the Texas Department of Public Safety, highway patrols, aviation assets, investigators, the Texas Parks and Wildlife Division, and our federal partners led by Customs and Border Protection. The collection of entities shares a common goal of keeping our state and nation safe by securing our side of the US-Mexico border.

Unless the Commission grants the requested waiver, we are concerned that Dell Telephone will cease to operate, which would cause the communications needs of certain Coalition members to be left unmet. This would greatly compromise security along the Texas-Mexico border – clearly not an outcome that the FCC should endorse.

Thank you for your attention to this important issue.  
For the Coalition,

A handwritten signature in blue ink, appearing to read "Donald L. Reay". The signature is fluid and cursive, with the first name "Donald" being more prominent than the last name "Reay".

Donald L. Reay  
Executive Director  
Texas Border Sheriff's Coalition